

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**BISOUS BISOUS LLC,**

*Plaintiff,*

**v.**

**THE CLE GROUP, LLC,  
BISOU UPTOWN MANAGER, LLC, and  
BISOU LP HOLDINGS, LLC,**

*Defendants.*

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**C.A. No. 3:21-cv-01614-B**

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**JOINT MOTION FOR ENTRY OF  
PROPOSED PROTECTIVE ORDER**

Pursuant to the Scheduling Order entered September 17, 2021, Dkt. 68, Plaintiff and Defendants respectfully move the Court for entry of a Protective Order. The Parties have met and conferred, and have agreed to the entry of the Protective Order attached as Exhibit 1.

Dated: December 8, 2021

Respectfully submitted,

**BUETHER JOE & COUNSELORS, LLC**

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By: /s/ Kenneth P. Kula

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***ATTORNEYS FOR PLAINTIFF***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF systems on this 8th day of December 2021.

/s/ Kenneth P. Kula

Kenneth P. Kula

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 7, 2021, Defendants' counsel met and conferred via electronic mail with Plaintiff's counsel pursuant to Local Rule CV-7(h) regarding the substance of this motion. Plaintiff's counsel indicated at that meet and confer that Plaintiff does not oppose the relief sought herein.

/s/ Kenneth P. Kula

Kenneth P. Kula